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March 24, 2025

VIA ELECTRONIC FILING

Honorable Daniel J. Stewart
United State District Court
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway
Albany NY 12207

RE: *Adirondack Ins. Exchange v. HSBC Bank, et al.*
Docket No.: 1:23-cv-01397 TJM/DJS
Our File No.: 20221816

Dear Judge Stewart:

Our firm represents plaintiff Adirondack Ins. Exchange in the above captioned matter.

In reviewing HSBC's response to Adirondack's cross-motion for partial summary judgment under Fed. R. Civ. P. 56, it has come to our attention that we inadvertently filed an incomplete statement of undisputed material facts. As such, pursuant to Fed. R. Civ. P. 60(a) we seek permission to file a corrected version. The substance of the filing is correct but the paragraph numbering is incomplete and not sequential. We will not make any changes other than the paragraph numbering. This will assist the Court as in rendering a decision it may elect to refer to certain paragraphs. We apologize for this oversight.

In addition, it is my understanding that pursuant to Local Rule 7.1(c), Adirondack may not file a reply in further support of its cross-motion without the Court's permission. Adirondack requests permission to file a brief reply in further support of its cross-motion for partial summary judgment, 10-pages or less, within ten (10) days of the date the Court grants the request.

Thank you for your consideration of the above respectfully submitted requests.



HURWITZ FINE P.C.

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Respectfully,

HURWITZ FINE P.C.

A handwritten signature in black ink, appearing to read 'S. Storm', with a long horizontal stroke extending to the right.

Scott D. Storm

c: Ryan A. Lema
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